

---

**COURT OF KING'S BENCH OF NEW BRUNSWICK**

Judicial District of

BETWEEN:

[Your Full Name], on behalf of all persons in New Brunswick who purchased Coca-Cola products from [Start Date] to [End Date]

*Plaintiff*

– and –

**The Coca-Cola Company and Coca-Cola Ltd.***Defendants***STATEMENT OF CLAIM (CLASS ACTION)****1. Overview**

This is a proposed class action on behalf of all residents of New Brunswick who purchased Coca-Cola products containing high levels of sugar. The Plaintiff alleges that the Defendants engaged in deceptive marketing practices by misrepresenting the health impacts of their products and failing to provide adequate warnings about the risks associated with excessive sugar consumption.

**2. The Parties**

**Plaintiff:** [Your Full Name], a resident of Moncton, New Brunswick, who has regularly consumed Coca-Cola products.

**Defendants:**

- **The Coca-Cola Company**, a multinational corporation headquartered in Atlanta, Georgia, involved in the manufacture and marketing of Coca-Cola beverages.
- **Coca-Cola Ltd.**, the Canadian subsidiary responsible for the distribution and marketing of Coca-Cola products in Canada.

**3. The Class**

All individuals residing in New Brunswick who purchased Coca-Cola products containing added sugars between [Start Date] and [End Date].

---

#### 4. Allegations

- The Defendants marketed their products as suitable for regular consumption without adequately disclosing the health risks associated with high sugar intake.
- The marketing practices created a misleading impression of the healthfulness of Coca-Cola products.
- The Defendants failed to provide clear and prominent warnings about the potential health consequences of excessive sugar consumption.

#### 5. Causes of Action

- **Negligent Misrepresentation:** The Defendants negligently misrepresented the health impacts of their products.
- **Breach of Consumer Protection Legislation:** The Defendants' marketing practices violated provisions of New Brunswick's consumer protection laws.
- **Unjust Enrichment:** The Defendants were unjustly enriched at the expense of consumers who were misled into purchasing their products.

#### 6. Relief Sought

The Plaintiff, on their own behalf and on behalf of the Class, claims:

- An order certifying this action as a class proceeding;
- General and special damages;
- Restitution of profits obtained through the sale of the products;
- Injunctive relief requiring the Defendants to cease misleading marketing practices and to provide adequate warnings;
- Costs of this action;
- Such further and other relief as this Honourable Court may deem just.

DATED at [City], New Brunswick, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

[Your Name]

Plaintiff in Person

[Your Address]

[Your Phone Number]

[Your Email Address]